

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Fleetwood Travel Trailers of IN, Inc.
1635 Elmore Street
Crawfordsville, Indiana 47933**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T107-7928-00045	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date:

TABLE OF CONTENTS

A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

B GENERAL CONDITIONS

- B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]
- B.2 Definitions [326 IAC 2-7-1]
- B.3 Permit Term [326 IAC 2-7-5(2)]
- B.4 Enforceability [326 IAC 2-7-7(a)]
- B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.6 Severability [326 IAC 2-7-5(5)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
- B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.10 Certification [326 IAC 2-7-4(f)]
- B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.12 Preventive Maintenance Plan [326 IAC 2-7-5][326 IAC 2-7-6][326 IAC 1-6-3]
- B.13 Emergency Provisions [326 IAC 2-7-16]
- B.14 Permit Shield [326 IAC 2-7-15]
- B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]
- B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.18 Permit Renewal [326 IAC 2-7-4]
- B.19 Administrative Permit Amendment [326 IAC 2-7-11]
- B.20 Minor Permit Modification [326 IAC 2-7-12]
- B.21 Significant Permit Modification [326 IAC 2-7-12(d)]
- B.22 Permit Revision Under Economic Incentives and Other Programs
- B.23 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]
- B.24 Operational Flexibility [326 IAC 2-7-20]
- B.25 Construction Permit Requirement [326 IAC 2]
- B.26 Inspection and Entry [326 IAC 2-7-6(2)]
- B.27 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]
- B.28 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

C SOURCE OPERATION CONDITIO

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 PSD Minor Source Status [326 IAC 2-2]
- C.2 Opacity [326 IAC 5-1]
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
- C.7 Asbestos Abatement Projects - Accreditation [326 IAC 14-10] [326 IAC 18-1]

Testing Requirements [326 IAC 2-7-6(1)]

- C.8 Performance Testing [326 IAC 3-2.1]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.9 Compliance Schedule [326 IAC 2-7-6(3)]

- C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
- C.12 Monitoring Methods [326 IAC 3]
- C.13 Pressure Gauge Specifications
- C.14 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18-1] [40 CFR 61.140]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.15 Compliance Monitoring Plan - Failure to Take Response Times [326 IAC 2-7-5(3)]
- C.16 Actions Related to Noncompliance Demonstrated by a Stack Test

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-6] [326 IAC 2-7-19]
- C.18 Monitoring Data Availability
- C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)]
- C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection

- C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - Chassis Fabrication Paint Booth, EU-1

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]
- D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.4 Testing Requirements [326 IAC 2-7-6(1)]
- D.1.5 Volatile Organic Compounds (VOC)

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.1.6 Particulate Matter (PM)
- D.1.7 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.8 Record Keeping Requirements

D.2 FACILITY OPERATION CONDITIONS - Adhesive Spray Booth, EU-2

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.2.1 Volatile Organic Compounds [326 IAC 8-2-12]
- D.2.2 Wood Furniture Manufacturing NESHAP [326 IAC 20-14 (40 CFR 63 Subpart JJ)]
- D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.2.5 Testing Requirements [326 IAC 2-7-6(1)]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.2.6 Particulate Matter (PM)
- D.2.7 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.2.8 Record Keeping Requirements

D.2.9 Reporting Requirements

D.3 FACILITY OPERATION CONDITIONS - Hand Application Processes, EU-3

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds [326 IAC 8-1-6]

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1)]

D.3.3 Volatile Organic Compounds (VOC)

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.4 Record Keeping Requirements

D.4 FACILITY OPERATION CONDITIONS - Woodworking Operation, EU-4

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.4.3 Testing Requirements [326 IAC 2-7-6(1)]

D.4.4 Particulate Matter

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.5 Visible Emissions Notations

D.4.6 Baghouse Inspections

D.4.7 Broken Bag or Failure Detection

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.8 Record Keeping Requirements

D.5 FACILITY OPERATION CONDITIONS - Degreasing Operations

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compounds [326 IAC 8-3-5(a)]

Certification Form

Emergency/Deviation Occurrence Report

Quarterly Report

Compliance Monitoring Report Form

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary travel trailer manufacturing operation.

Responsible Official: Erroll A. Cheney
Source Address: 1635 Elmore Street, Crawfordsville, Indiana 47933
Mailing Address: P.O. Box 665, Crawfordsville, Indiana 47933
SIC Code: 3792
County Location: Montgomery
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) chassis fabrication paint booth, identified as spray booth EU-1, utilizing air assisted airless equipment, with a maximum capacity of 96 units per day with an average of 4 units per hour, using dry filters as control, equipped with a 100 cfm exhaust fan, and exhausting to stack S1.
- (2) One (1) adhesive spray booth, identified as spray booth EU-2, utilizing HVLP spray equipment, with a maximum capacity of 96 units per day with an average of 4 units per hour, using dry filters as control, equipped with a 100 cfm exhaust fan, and exhausting to stack S2.
- (3) Uncontrolled VOC emissions from hand application processes which use sealants, caulks, adhesives and cleaning solvents, with a maximum capacity of 96 units per day with an average of 4 units per hour, exhausted to source ventilation and identified as EU-3.
- (4) One (1), exterior wall assembly station, identified as EU-4, utilizing various woodworking equipment, using a baghouse for particulate control, and exhausting to stack S4.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour. (Twenty-nine (29) natural gas-fired overhead space heaters rated at 175,000 Btu/hr each, four (4) natural gas-fired overhead space heaters rated at 100,000 Btu/hr each and twelve (12) natural gas-fired space heaters rated at 80,000 Btu/hr each.)

- (2) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (3) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (4) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (5) Paved and unpaved roads and parking lots with public access.
- (6) Filter or coalescer media changeout.
- (7) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) it is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) it is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or for
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
 - (5) Any insignificant activity that has been added without a permit revision; and
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
 - (g) Operations may continue during an emergency only if the following conditions are met:

- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
- (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, *and* IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]
Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM shall reserve the right to issue a new permit.

26. Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:
- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.11 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.13 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

- (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6][326 IAC 2-7-19 (e)]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source;
 - (2) Indicate actual emissions of other regulated pollutants from the source.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.17 Monitoring Data Availability

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request ~~providing they are made available within thirty (30) days after written request.~~ **If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit.

To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

- (1) One (1) chassis fabrication paint booth, identified as spray booth EU-1, utilizing air assisted airless equipment, with a maximum capacity of 4 units per hour, using dry filters as control, equipped with a 100 cfm exhaust fan, and exhausting to stack S1.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating), the volatile organic compound (VOC) content of coating delivered to the applicator at the chassis fabrication paint booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c)(Particulate Emission Limitations), the particulate matter (PM) overspray from the spray booth shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Particulate Matter (PM)

Pursuant to CP 107-3252-00045, issued on June 13, 1994, the dry filters for PM control shall be in operation at all times when the paint booth is in operation.

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (d) The overspray from the paint booths shall be considered in compliance provided that the overspray is not:
 - (1) visibly detectable at the exhaust;
 - (2) detectable on the rooftops; or
 - (3) causing any nuisance problems.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each day;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.6 and D.1.7, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

- (2) One (1) adhesive spray booth, identified as spray booth EU-2, utilizing HVLP spray equipment, with a maximum capacity of 4 units per hour, using dry filters as control, equipped with a 100 cfm exhaust fan, and exhausting to stack S2.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.2.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to CP 107-3252-00045, issued on June 13, 1994, the particulate matter (PM) overspray from the spray booth shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.2.4 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.2.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Particulate Matter (PM)

Pursuant to CP 107-3252-00045, issued on June 13, 1994, the dry filters for PM control shall be in operation at all times when the paint booth is in operation.

D.2.6 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (d) The overspray from the paint booths shall be considered in compliance provided that the overspray is not:
 - (1) visibly detectable at the exhaust;
 - (2) detectable on the rooftops; or
 - (3) causing any nuisance problems.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6 and D.2.7, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3

FACILITY OPERATION CONDITIONS

- (3) Uncontrolled VOC emissions from hand application processes which use sealants, caulks, adhesive and cleaning solvents exhausted to source ventilation and identified as EU-3.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) The total potential to emit volatile organic compounds from EU-3 (Uncontrolled VOC emissions from hand application processes which use sealants, caulks, adhesives and cleaning solvents), is limited to 24 tons per year, based on a monthly rolling average. Therefore, the requirements of 326 IAC 8-1-6 (BACT) will not apply.
- (b) Any change or modification which may increase emissions to 25 tons per twelve (12) month rolling period, from the equipment covered in this permit, must be approved by the Office of Air Management (OAM) before such change may occur.

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the VOC limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

D.3.3 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer.

IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.5 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.4 FACILITY OPERATION CONDITIONS

- (4) One (1), exterior wall assembly station, identified as EU-4, utilizing various woodworking equipment, using a baghouse for particulate control, and exhausting to stack S4.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the woodworking facilities shall not exceed 3.72 pounds per hour when operating at a process weight rate of 1727 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.4.3 Testing Requirements [326 IAC 2-7-6(1)]

Testing of this facility is not specifically required by this permit. However, if testing is required, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing. This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.

D.4.4 Particulate Matter

The baghouse for PM control shall be in operation at all times when the woodworking facility is in operation and exhausting to the outside atmosphere.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.5 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouse exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.4.6 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.4.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.
- (b) Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.8 Record Keeping Requirements

- (a) To document compliance with Condition D.4.4 and D.4.5, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust.
- (b) To document compliance with Condition D.4.6, the Permittee shall maintain records of the results of the inspections required under Condition D.4.6 and the dates the vents are redirected.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.5

FACILITY OPERATION CONDITIONS

Insignificant Activity - Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.

- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Fleetwood Travel Trailers of IN, Inc.
Source Address: 1635 Elmore Street, Crawfordsville, IN 47933
Mailing Address: P.O. Box 665, Crawfordsville, IN 47933
Part 70 Permit No.: T107-7928-00045

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Emergency/Deviation Occurrence Reporting Form
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Fleetwood Travel Trailers of IN, Inc.
Source Address: 1635 Elmore Street, Crawfordsville, IN 47933
Mailing Address: P.O. Box 665, Crawfordsville, IN 47933
Part 70 Permit No.: T107-7928-00045

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C	The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Fleetwood Travel Trailers of IN, Inc.
Source Address: 1635 Elmore Street, Crawfordsville, IN 47933
Mailing Address: P.O. Box 665, Crawfordsville, IN 47933
Part 70 Permit No.: T000-0000-00000
Facility: Adhesive Spray Booth
Parameter: HAPs
Limit: Less than 100 gallons per month

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	HAP Containing Finishing Material (gallons)	HAP Containing Adhesives (gallons)	Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE REPORT**

Source Name: Fleetwood Travel Trailers of IN, Inc.
Source Address: 1635 Elmore Street, Crawfordsville, IN 47933
Mailing Address: P.O. Box 665, Crawfordsville, IN 47933
Part 70 Permit No.: T107-7928-00045

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify zero in the column marked "No Deviations".

LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

Requirement (eg. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Management**

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: Fleetwood Travel Trailers of IN, Inc.
Source Location: 1635 Elmore Street, Crawfordsville, IN 47933
County: Montgomery
SIC Code: 3792
Operation Permit No.: T107-7928-00045
Permit Reviewer: Jay Patterson

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Fleetwood Travel Trailers of IN, Inc. relating to the travel trailer manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (1) One (1) chassis fabrication paint booth, identified as spray booth EU-1, utilizing air atomization, with a maximum capacity of 4 units per hour, using dry filters as control, equipped with a 100 cfm exhaust fan, and exhausting to stack S1.
- (2) One (1) cabinet shop booth, identified as spray booth EU-2, utilizing airless spray equipment, with a maximum capacity of 4 units per booth per hour, using dry filters as control, equipped with a 100 cfm exhaust fan, and exhausting to stack S2.
- (3) One (1) molding and final finish station, identified as EU-3, applying coating by hand wiping, with a maximum capacity of 4 units per hour, and exhausting to source ventilation.
- (4) One (1), exterior wall assembly station, identified as EU-4, utilizing various woodworking equipment, using a baghouse for particulate control, and exhausting to stack S4.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Emission Units and Pollution Control Equipment Under Enhanced New Source Review (ENSR)

There are no new facilities to be reviewed under the ENSR process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(20):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour. (Twenty-nine (29) natural gas-fired overhead space heaters rated at 175,000 Btu/hr each, four (4) natural gas-fired overhead space heaters rated at 100,000 Btu/hr each and twelve (12) natural gas-fired space heaters rated at 80,000 Btu/hr each.)

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for Part 70 Operating Permit

Source Name: Fleetwood Travel Trailers of IN, Inc.
Source Location: 1635 Elmore Street, Crawfordsville, IN 47933
County: Montgomery
SIC Code: 3792
Operation Permit No.: T107-7928-00045
Permit Reviewer: J. Patterson

On November 5, 1997, the Office of Air Management (OAM) had a notice published in the Journal Review, Crawfordsville, Indiana, stating that Fleetwood Travel Trailers of IN, Inc. had applied for a Part 70 Operating Permit to operate a travel trailer manufacturing plant. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On December 11, 1997, Fleetwood Travel Trailers of IN, Inc. submitted comments on the proposed Part 70 permit. The summary of the comments is as follows. All changes are bolded for emphasis and the language with a line through it has been deleted.

Comment 1:

The maximum capacity of four (4) units per hour should be removed from the description of each of these emission units. This could be interpreted to be a permit limitation and restrict the facility to producing only four (4) Travel Trailers per hour. We recognize that the factor is used to calculate the emission unit's potential to emit. However, if the facility acquires new application methods and/or hazardous materials, which contain less or no VOC, this limitation would not allow them to increase production. As currently written this limitation will not allow the facility the flexibility to increase production even though their potential to emit has decreased.

Response to Comment 1:

Section A (Source Summary) has been revised to clarify that the description of the source in conditions A.1 through A.3 is informational only and does not constitute separately enforceable conditions. The descriptive information in other permit conditions is enforceable.

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) ~~and presented in the permit application.~~ **The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.**

In addition, the maximum capacities have been changed as follows:

- (1) One (1) chassis fabrication paint booth, identified as spray booth EU-1, utilizing air atomization, with a maximum capacity of **96 units per day with an average of 4 units** per hour, using dry filters as control, equipped with a 100 cfm exhaust fan, and exhausting to stack S1.
- (2) One (1) cabinet shop booth, identified as spray booth EU-2, utilizing airless spray equipment, with a maximum capacity of **96 units per day with an average of 4 units** per hour, using dry filters as control, equipped with a 100 cfm exhaust fan, and exhausting to stack S2.
- (3) One (1) molding and final finish station, identified as EU-3, applying coating by hand wiping, with a maximum capacity of **96 units per day with an average of 4 units** per hour, and exhausting to source ventilation.

Comment 2:

The correct application method for the emissions unit A.2(1) is air assisted airless.

Response to Comment 2:

This description has been revised to read that the application method is air assisted airless.

The following changes will be made to the final Part 70 permit:

1. Because of changes to the description of EU-1, A.2(1), and D.1(1), have changed from:

- (1) One (1) chassis fabrication paint booth, identified as spray booth EU-1, utilizing air atomization, with a maximum capacity of 4 units per hour, using dry filters as control, equipped with a 100 cfm exhaust fan, and exhausting to stack S1.

to be as follows:

- (1) One (1) chassis fabrication paint booth, identified as spray booth EU-1, utilizing air **assisted airless equipment** ~~atomization~~, with a maximum capacity of 4 units per hour, using dry filters as control, equipped with a 100 cfm exhaust fan, and exhausting to stack S1.

There are no changes to other conditions or calculations due to this change in method application.

The following changes in the Technical Support Document (TSD) should be noted:

1. The Emission Units and Pollution Control Equipment section, number (1), on page 1 of 12, was proposed as:
 - (1) One (1) chassis fabrication paint booth, identified as spray booth EU-1, utilizing air atomization, with a maximum capacity of 4 units per hour, using dry filters as control, equipped with a 100 cfm exhaust fan, and exhausting to stack S1.

Because of changes in the description, this emission unit should be as follows:

- (1) One (1) chassis fabrication paint booth, identified as spray booth EU-1, utilizing air **assisted airless equipment** ~~atomization~~, with a maximum capacity of 4 units per hour, using dry filters as control, equipped with a 100 cfm exhaust fan, and exhausting to stack S1.

Comment 3:

The correct application method for the emissions unit, EU-2, is HVLP.

Response to Comment 3:

This description has been revised to read that the application method is HVLP (and from comment number 18 the description of the booth will be changed to adhesive spray booth).

The following changes will be made to the final Part 70 permit:

1. Because of changes to the description of EU-2, A.2(2), and D.2(2), have changed from:
 - (2) One (1) cabinet shop booth, identified as spray booth EU-2, utilizing airless spray equipment, with a maximum capacity of 4 units per hour, using dry filters as control, equipped with a 100 cfm exhaust fan, and exhausting to stack S2.

to be as follows:

- (2) One (1) ~~cabinet shop~~ **adhesive spray** booth, identified as spray booth EU-2, utilizing **HVLP** ~~airless~~ spray equipment, with a maximum capacity of 4 units per hour, using dry filters as control, equipped with a 100 cfm exhaust fan, and exhausting to stack S2.

There are no changes to other conditions or calculations due to this change in method application.

The following changes in the Technical Support Document (TSD) should be noted:

1. The Emission Units and Pollution Control Equipment section, number (2), on page 1 of 12, was proposed as:
 - (2) One (1) cabinet shop booth, identified as spray booth EU-2, utilizing airless spray equipment, with a maximum capacity of 4 units per hour, using dry filters as control, equipped with a 100 cfm exhaust fan, and exhausting to stack S2.

Because of changes in the description, this emission unit should be as follows:

- (2) One (1) ~~cabinet shop~~ **adhesive spray** booth, identified as spray booth EU-2, utilizing **HVLP** ~~airless~~ spray equipment, with a maximum capacity of 4 units per hour, using dry filters as control, equipped with a 100 cfm exhaust fan, and exhausting to stack S2.

Comment 4:

Change the description of source EU-3 to read as follows:

Uncontrolled VOC emissions from hand application processes which use sealants, caulks, adhesive and cleaning solvents exhausted to source ventilation and identified as EU-3.

Response to Comment 4:

The description has been revised to more accurately reflect this process.

The following changes will be made to the Part 70 permit:

1. Because of changes to the description of EU-3, A.2(3), and D.3(3), have changed from:

- (3) One (1) molding and final finish station, identified as EU-3, applying coating by hand wiping, with a maximum capacity of 4 units per hour, and exhausting to source ventilation.

to be as follows:

- ~~(3) One (1) molding and final finish station, identified as EU-3, applying coating by hand wiping, with a maximum capacity of 4 units per hour, and exhausting to source ventilation.~~
- (3) **Uncontrolled VOC emissions from hand application processes which use sealants, caulks, adhesives and cleaning solvents, with a maximum capacity of 96 units per day with an average of 4 units per hour, exhausted to source ventilation and identified as EU-3.**

There are no changes to other conditions or calculations due to this change in emission unit description.

The following changes in the Technical Support Document (TSD) should be noted:

1. The Emission Units and Pollution Control Equipment section, number (3), on page 1 of 12, was proposed as:

- (3) One (1) molding and final finish station, identified as EU-3, applying coating by hand wiping, with a maximum capacity of 4 units per hour, and exhausting to source ventilation.

Because of changes in the description, this emission unit should be as follows:

- (3) **Uncontrolled VOC emissions from hand application processes which use sealants, caulks, adhesives and cleaning solvents, with a maximum capacity of 96 units per day with an average of 4 units per hour, exhausted to source ventilation and identified as EU-3.**

Comment 5:

Insignificant activity, A.3(2), should be removed because the facility does not have a gasoline dispensing operation on site.

Response to Comment 5:

This insignificant activity has been deleted.

The following changes in the Technical Support Document (TSD) should be noted:

- (1) Insignificant activity (2), a gasoline fuel transfer and dispensing facility, page 2 of 12, has been deleted.

Comment 6:

These citations, A.3(9) and D.5, should be removed from the permit since the vapor pressure of the solvent we use is less than 15mmHg at 100EF(see enclosed MSDS in Appendix 1).

Response to Comment 6:

The vapor pressure of the solvent used is not a criteria for exemption. Rule 326 IAC 8-3-5(a)(1)(A) states that if the solvent vapor pressure is greater than 15mmHg at 100EF then the cover must be designed so that it can easily be operated with one hand. Therefore, these citations will remain unchanged.

Comment 7:

To maintain our operational flexibility Fleetwood needs to be able to switch to different adhesives, sealants, caulks and cleaning solvents, without prior approval from IDEM-OAM and EPA. We would like this explicitly stated as an Alternative Operating Scenario (AOS). We propose the AOS to read as follows:

The source can change hazardous materials used at the facility, only if the new hazardous material to be used contains the same or less VOC and HAPs as the material it is replacing.

Response to Comment 7:

These types of changes are already addressed in B.24. 326 IAC 2-7-20(d) states that an owner or operator of a Part 70 source may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of the Part 70 permit for the source in accordance with 326 IAC 2-7-5(9), without a prior permit revision, subject to compliance with such permit terms and conditions. To procure alternative operating scenarios for its Part 70 permit, the owner or operator of a Part 70 source must request such alternative scenarios in its application for the permit in accordance with 326 IAC 2-7-4(c)(7). No advanced notice to the department is required prior to making such a change.

Comment 8:

Fleetwood is proposing to add a condition under this section to simplify and clarify what is the entire source's emissions limit for VOC. Instead of limiting each specific emissions unit within the entire source, we propose a facility-wide limit, also known as the bubble approach. We propose to add the following condition to Section C Source Operation Conditions:

C.1(c)

The annual plant-wide emissions of VOC in tons/year shall not exceed 55, pursuant to 326 IAC 2-1-5 Emission limitations.

Response to Comment 8:

The specific emission units have not been limited in this Title V permit. There is no source wide emission limit for VOCs unless future changes or modifications increase the VOC potential to emit to 250 tons per year. At that time Fleetwood may accept a limit in order to avoid PSD requirements. Therefore, this condition will not be added.

Comment 9:

Remove the Emergency Reduction Plan Requirement of 326 IAC 1-5-2. This regulation is only for applicable sources whose potential to emit is greater than 100 tons per year. Since, Fleetwood Travel Trailers potential to emit is below the applicable threshold this requirement does not apply.

Response to Comment 9:

The potential of PM emissions is greater than 100 tons/yr, however the potential to emit of PM emissions is less than 100 tons/yr. Therefore, the OAM agrees and this proposed condition, C.15, Emergency Reduction Plan, will be deleted.

All subsequent conditions have been renumbered accordingly.

Comment 10:

Remove the Risk Management Plan requirements of 326 IAC 2-7-5(12). The facility in its 25 years of operation has never met the threshold planning quantity for any of the materials listed in 40 CFR 68.215 (see attached Tier II reporting information in Appendix 2).

Response to Comment 10:

The OAM agrees and this proposed condition, C.16, Risk Management Plan, will be deleted. All subsequent conditions have been renumbered accordingly.

Comment 11:

Change the emissions standard from a process weight rate extrapolation to a filter efficiency standard in Condition D.1.2. Fleetwood does not operate their spray booths without filtering systems in place (*if we did the booth would not be operational for long*). Therefore, particulate matter emissions from a coating operation can be directly attributed to the usage of coatings per hour, transfer efficiency of the application equipment, solids content of the coating and efficiency of the filtering system used. Hence, the following interpolation and extrapolation of the emission unit can be used.

$$E = (FE)(S)(U)(0.65)$$

Where: E = emissions in lbs/hr

FE = difference between %filter efficiency and 100 (efficiency based on EPA Test Method 319)

S = % by weight of solids in coating (ASTM D-2369)

U = Usage of coating in lbs/hr

0.65 = transfer efficiency of an HVLP or Air Assis Airless Spray Gun

Fleetwood's emissions of particulate matter from use of Valvoline Tectyl 329 HG in the spray booth would be as follows:

$$E = (0.0024)(0.38)(18 \text{ lbs/hr})(0.65) = 0.01 \text{ lbs of PM emissions per hour}$$

This type of calculation is used in other states where we have like operations. We have included documentation supporting the above calculations; it is attached as Appendix 3.

Response to Comment 11:

The OAM understands the difficulty of determining an allowable emission rate using 326 IAC 6-3-2, Process Weigh Rate. Due to the ambiguities associated with this rule in relation to spray booths, the OAM decided that as long as the dry filters (controls) are in place and the overspray is not visibly detectable at the exhaust or on the rooftops, the process will be in compliance with this rule. The OAM does use the above calculations in determining potential emissions (transfer efficiency factor should be 1-%transfer efficiency, not % transfer efficiency) for PM emissions from spray booths to determine applicability to rules. However, by quantifying the allowable rate, the source is put in a difficult position to show compliance with this rate. The OAM views compliance of a spray booth with 326 IAC 6-3-2 qualitatively as opposed to quantitatively. Therefore, this condition, D.1.2, will remain unchanged.

Comment 12:

Change Condition D.1.5 to read as follows:

Compliance with the VOC content, contained in Condition D.1.1 shall be determined by the following methods. VOC content of coatings used determined by the formulation data supplied on the manufacturers MSDS. IDEM-OAM reserves the authority to determine compliance of coatings sprayed in the emissions unit by using EPA Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Response to Comment 12:

The key word omitted from the suggested change is "usage". However, usage records are necessary to determine a volume-weighted average when more than one coating is used. Therefore, this condition D.1.5, will remain unchanged.

Comment 13:

Daily inspections of filter media used is a burdensome condition for an emissions unit, whose potential to emit is below regulatory thresholds (see D.1.2). Furthermore, Fleetwood facilities do not operate their spray booths without filtering systems in place. We use a polyester blanket filter media that is placed securely in a snap track. Therefore, it is always held securely in place in front of the exhaust face. Consequently, the placement of the filter media is never in question. Fleetwood is requesting to have this condition (D.1.7(a) removed completely, see next item for further explanation.

Response to Comment 13:

Because it is difficult to establish an allowable emission rate per 326 IAC 6-3-2, as previously stated in response # 11, OAM requires that in order to show compliance with this rule that dry filters must be in operation when the spray booth is in operation. Daily inspection is simply a visual observation of the filters and their condition. The OAM does not believe that this is too burdensome a requirement upon the company. Therefore, this condition will remain unchanged.

Comment 14:

Weekly inspections for overspray on rooftops, Condition D.1.7(b), is an unacceptable condition. During the winter, there are times when our rooftops are covered with snow and/or ice. Weekly inspection during this time compromises the safety of our associates. Fleetwood proposes monitoring compliance for overspray by employing the following work practice standards:

- C Use blanket polyester filter media with an average removal efficiency of 95% or greater in the spray booth.
- C Use a snap track to securely fasten the blanket filter media across the exhaust face.
- C Document filter change outs as specified by filter manufacturer (i.e.-amount of solids material sprayed through the booth)

Response to Comment 14:

The OAM agrees that for this facility the monitoring of rooftops for overspray is unnecessary. However, weekly inspections of the stack exhaust around the surrounding ground will still be a compliance monitoring requirement. This will ensure the dry filters are working properly. Again, OAM does not believe this is too burdensome a requirement upon the company.

The following changes will be made to the Part 70 permit:

1. Because of changes to the compliance monitoring, Condition D.1.7(b), has changed from:

- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

to be as follows:

- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The following changes in the Technical Support Document (TSD) should be noted:

1. The Compliance Monitoring section for the spray booths, 1(b), page 9 of 12, was proposed as:
 1. The spray booths have applicable compliance monitoring conditions as specified below:
 - (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.

Because of changes in the compliance monitoring, this section should be as follows:

- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.

Comment 15:

Remove condition D.1.7(d)(2) completely. See explanation above.

Response to Comment 15:

These conditions are from previous operating permits and are necessary to show compliance with 326 IAC 6-3-2. Rooftops inspections have been removed from the compliance monitoring requirements, however, this does not mean overspray can accumulate on the roof. Presence of overspray on the roof is indicative of filter problems. Rooftop observations may take place during routine maintenance of the plant or as requested by IDEM. Therefore, this condition will remain unchanged.

Comment 16:

Fleetwood is requesting to have the VOC record keeping requirements, Conditions D.1.8 (a)(3)(4)(5), reduced from daily to monthly. The source is not a major source for VOC and has facility-wide potential emissions of less than 25 tons/year. We are requesting to demonstrate compliance with the 55 tons/year limitation as specified in Condition C.1(c) on a continuous basis by, logging emissions of VOC from the entire source on a 12 month rolling average basis.

Response to Comment 16:

The record keeping requirement in Condition D.1.8 is to show compliance with Condition D.1.1. When non-compliant coating are used and volume weighting is necessary for compliance, then daily record keeping is required, pursuant to 326 IAC 8-1-2(a)(7). Therefore, this condition will be revised to indicate monthly record keeping, when appropriate, as opposed to daily.

The following changes will be made to the final Part 70 permit:

1. Because of change in record keeping frequency, Condition D.1.8(a), has changed from:

D.1.8 Record Keeping Requirements	
(a)	To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
(1)	The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
(2)	A log of the dates of use;
(3)	The volume weighted VOC content of the coatings used for each day;
(4)	The cleanup solvent usage for each day;
(5)	The total VOC usage for each day; and
(6)	The weight of VOCs emitted for each compliance period.

to be as follows:

D.1.8 Record Keeping Requirements	
(a)	To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
(1)	The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) A log of the dates of use;
- (3) The volume weighted VOC content of the coatings used for each day;
- (4) The cleanup solvent usage for each ~~day~~ month;
- (5) The total VOC usage for each ~~day~~ month; and
- (6) The weight of VOCs emitted for each compliance period.

Comment 17:

Change Condition D.1.8(b) to reflect the proposed conditions outlined in D.1.7(b). The condition should read as follows.

D.1.8(b)

To document compliance with condition D.1.7(b), the permittee will maintain a log of filter change outs and a certified filter performance test for the media used. A log will also be maintained for those additional inspections prescribed by the Preventive Maintenance Plan.

Response to Comment 17:

Rooftop inspections have been removed from the compliance monitoring requirement, however, daily filter status and weekly observation of the ground are still necessary. Therefore, this condition will remain unchanged.

Comment 18:

To further clarify Fleetwood's exemption to the Wood Furniture MACT standard, we propose the following change to Condition D.2.2.

D.2.2

The adhesive spray booth, EU-2, is subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998. Since this source meets the criteria for incidental furniture manufacturer and would be limited to less than 100 gallons/month of HAP containing finishing and/or adhesive materials. Pursuant to 40 CFR 63.800(a), the provisions of the National Emission standards for Wood Furniture Manufacturing Operations do not apply.

Response to Comment 18:

Upon further review, Fleetwood Travel Trailers is not subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.800 Subpart JJ because the wood products utilized in the travel trailers are not manufactured as described by the following Standard Industrial Classification codes: 2434, 2511, 2512, 2517, 2519, 2521, 2531, 2541, 2599 or 5712.

The following changes will be made to the final Part 70 permit:

~~D.2.2 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]~~

~~The adhesive spray booth, EU-2, is subject to the National Emission Standard for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998. Since this source meets the criteria for incidental furniture manufacturer and shall be limited to less than 100 gallons of HAP containing finishing material and adhesive per~~

~~month, pursuant to 40 CFR 63.800(a), the provisions of the National Emission Standards for Wood Furniture Manufacturing Operations do not apply.~~

D.2.7 Record Keeping Requirements

- (a) To document compliance with Condition D.2.6 and D.2.7, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventative Maintenance Plan.
- ~~(b) To document compliance with D.2.2, the Permittee shall maintain a monthly log of HAP-containing finishing material and adhesives used in the manufacture of wood furniture or wood furniture components.~~
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

~~D.2.9 Reporting Requirements~~

~~A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.~~

The following changes in the Technical Support Document (TSD) should be noted:

Federal Rule Applicability

- (a) Fleetwood Travel Trailers of IN, Inc. is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.390, Subpart MM), because trailers are not considered automobiles.
- ~~(b) Fleetwood Travel Trailers of IN, Inc. is not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20-14, (40 CFR 63.800, Subpart JJ) because the cabinet shop booth does not have the potential to emit 10 tons per year or more of a single hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants.~~

Because of a change in rule applicability determination, this section should be as follows:

Federal Rule Applicability

- (a) Fleetwood Travel Trailers of IN, Inc. is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.390, Subpart MM), because trailers are not considered automobiles.
- (b) Fleetwood Travel Trailers is not subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.800 Subpart JJ because the wood products utilized in the travel trailers are not manufactured as described by the following Standard Industrial Classification codes: 2434, 2511, 2512, 2517, 2519, 2521, 2531, 2541, 2599 or 5712.

Comment 19:

Change the emissions standard from a process weight rate extrapolation to a filter efficiency standard in Condition D.2.3. Fleetwood does not operate their spray booths without filtering systems in place (*if we did the booth would not be operational for long*). Therefore, particulate matter emissions from a coating operation can be directly attributed to the usage of coatings per hour, transfer efficiency of the application equipment, solids content of the coating and efficiency of the filtering system used. Hence, the following interpolation and extrapolation of the emission unit can be used.

$$E = (FE)(S)(U)(0.65)$$

Where: E = emissions in lbs/hr

FE = difference between %filter efficiency and 100 (efficiency based on EPA Test Method 319)

S = % by weight of solids in coating (ASTM D-2369)

U = Usage of coating in lbs/hr

0.65 = transfer efficiency of an HVLP or Air Assis Airless Spray Gun

Fleetwood's emissions of particulate matter from use of Valvoline Tectyl 329 HG in the spray booth would be as follows:

$$E = (0.0024)(0.43)(2 \text{ lbs/hr})(0.65) = 0.001 \text{ lbs of PM emissions per hour}$$

This type of calculation is used in other states where we have like operations. We have included documentation supporting the above calculations; it is attached as Appendix 3.

Response to Comment 19:

The OAM understands the difficulty of determining an allowable emission rate using 326 IAC 6-3-2, Process Weigh Rate. Due to the ambiguities associated with this rule in relation to spray booths, the OAM decided that as long as the dry filters (controls) are in place and the overspray is not visibly detectable at the exhaust or on the rooftops, the process will be in compliance with this rule. The OAM does use the above calculations in determining potential emissions (transfer efficiency factor should be 1-%transfer efficiency, not % transfer efficiency) for PM emissions from spray booths to determine applicability to rules. However, by quantifying the allowable rate, the source is put in a difficult position to show compliance with this rate. The OAM views compliance of a spray booth with 326 IAC 6-3-2 qualitatively as opposed to quantitatively. Therefore, this condition, D.2.3, will remain unchanged.

Comment 20:

Daily inspections of filter media used is a burdensome condition (D.2.7(a)) for an emissions unit, whose potential to emit is below regulatory thresholds (see D.2.3). Furthermore, Fleetwood facilities do not operate their spray booths without filtering systems in place. We use a polyester blanket filter media that is placed securely in a snap track. Therefore, it is always held securely in place in front of the exhaust face. Consequently, the placement of the filter media is never in question. Fleetwood is requesting to have this condition removed completely, see next item for further explanation.

Response to Comment 20:

Because it is difficult to establish an allowable emission rate per 326 IAC 6-3-2, as previously stated, OAM requires that in order to show compliance with this rule that dry filters must be in operation when the spray booth is in operation. Daily inspection is simply a visual observation of the filters and their condition. The OAM does not believe that this is too burdensome a requirement upon the company. Therefore, this condition, D.2.7(a), will remain unchanged.

Comment 21:

Weekly inspections for overspray on rooftops is an unacceptable condition (D.2.7(b)). During the winter, there are times when our rooftops are covered with snow and/or ice. Weekly inspection during this time compromises the safety of our associates. Fleetwood proposes monitoring compliance for overspray by employing the following work practice standards:

- C Use blanket polyester filter media with an average removal efficiency of 95% or greater in the spray booth.
- C Use a snap track to securely fasten the blanket filter media across the exhaust face.
- C Document filter change outs as specified by filter manufacturer (i.e.-amount of solids material sprayed through the booth)

Response to Comment 21:

The OAM agrees that for this facility the monitoring of rooftops for overspray is unnecessary. However, weekly inspections of the stack exhaust around the surrounding ground will still be a compliance monitoring requirement. This will ensure the dry filters are working properly. Again, OAM does not believe this is too burdensome a requirement upon the company.

The following changes will be made to the Part 70 permit:

1. Because of changes to the compliance monitoring, Condition D.2.7(b), has changed from:
 - (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

to be as follows:

- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the ~~rooftops and the~~ nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The following changes in the Technical Support Document (TSD) should be noted:

1. The Compliance Monitoring section for the spray booths, 1(b), page 9 of 12, was proposed as:
 1. The spray booths have applicable compliance monitoring conditions as specified below:
 - (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.

Because of changes in the compliance monitoring, this section should be as follows:

- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the ~~rooftops and the~~ nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.

Comment 22:

Remove Condition D.2.7(d)(2) completely. See explanation above.

Response to Comment 22:

These conditions are from previous operating permits and are necessary to show compliance with 326 IAC 6-3-2. Rooftops inspections have been removed from the compliance monitoring requirements, however, this does not mean overspray can accumulate on the roof. Presence of overspray on the roof is indicative of filter problems. Rooftop observations may take place during routine maintenance of the plant or requested by IDEM. Therefore, this condition, D.2.7(d)(2), will remain unchanged.

Comment 23:

Change Condition D.2.8(a) to reflect the proposed conditions outlined in D.2.7(b). The condition should read as follows.

D.2.8(a)

To document compliance with condition D.2.7(b), the permittee will maintain a log of filter change outs and a certified filter performance test for the media used. A log will also be maintained for those additional inspections prescribed by the Preventive Maintenance Plan.

Response to Comment 23:

Rooftop inspections have been removed from the compliance monitoring requirement, however, daily filter status and weekly observation of the ground are still necessary. Therefore, this condition, D.2.8(a), will remain unchanged.

Comment 24:

Change Condition D.2.8(b) to reflect the changes made in D.2.2. The condition should read as follows.

D.2.8(b)

To document compliance with D.2.2, the permittee shall maintain a monthly log of HAP containing finishing and/or adhesive materials used in the manufacture of wood furniture or wood furniture components.

Response to Comment 24:

Please see response to comment 18.

Comment 25:

The potential emissions from Source EU-3, Condition D.3.1, are greater than 25 tons/yr. In order to avoid BACT requirements for this emission unit, we agreed to limit actual emissions from this source to 25 tons per year. To avoid confusion, we would like to have the 25 tons per year limitation clearly identified as **ACTUAL** emissions.

Response to Comment 25:

Previously, it was determined that the potential VOC emissions from EU-3 were less than 25 tons per year and the requirements of 326 IAC 8-1-6, BACT, would not apply. However, upon further review, the potential VOC emissions from EU-3 are in fact greater than 25 tons per year.

1. Due to further technical review, Condition D.3.1 will be changed as follows. In addition, a new reporting condition, accompanied by a new report form, will be added. These new conditions are necessary in order to comply with the non-applicability of the BACT requirements.

The new report form will appear at the end of this addendum.

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

~~The potential VOC emissions from the caulks and adhesives used in EU-3, Molding and Final Finish Station, are less than 25 tons/yr. Therefore, 326 IAC 8-1-6 does not apply. Prior to any change in the operation which may result in an increase in potential emissions exceeding those specified in 326 IAC 8-1-6, this change must be approved by the Office of Air Management.~~

- (a) The total potential to emit volatile organic compounds from EU-3 (Uncontrolled VOC emissions from hand application processes which use sealants, caulks, adhesives and cleaning solvents), is limited to 24 tons per year, based on a monthly rolling average. Therefore, the requirements of 326 IAC 8-1-6 (BACT) will not apply.**
- (b) Any change or modification which may increase emissions to 25 tons per twelve (12) month rolling period, from the equipment covered in this permit, must be approved by the Office of Air Management (OAM) before such change may occur.**

D.3.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

Comment 26:

Change Condition D.3.3 to read as follows:

Compliance with the VOC content, contained in Condition D.3.1 shall be determined by the following methods. VOC content of coatings used determined by the formulation data supplied on the manufacturers MSDS. IDEM-OAM reserves the authority to determine compliance of coatings sprayed in the emissions unit by using EPA Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Response to Comment 26:

The key word omitted from the suggested condition is "usage". However, usage records are necessary to determine a volume-weighted average when more than one coating is used. Therefore, this condition D.3.3, will remain unchanged.

Comment 27:

Fleetwood is requesting to have the VOC record keeping requirements, Conditions D.3.4 (a)(3)(4)(5), reduced from daily to monthly. The source is not a major source for VOC and has facility-wide potential emissions of less than 25 tons/year. We are requesting to demonstrate compliance with the 55 tons/year limitation as specified in Condition C.1(c) on a continuous basis by, logging emissions of VOC from the entire source on a 12 month rolling average basis.

Response to Comment 27:

The record keeping requirement in Condition D.3.4(a) is to show compliance with Condition D.3.1. The OAM agrees that monthly record keeping is a sufficient frequency when using compliant coating. Daily volume weighted averages is not necessary to comply with condition D.3.1, therefore, it will be deleted. This condition will be revised to indicate monthly record keeping.

The following changes will be made to the final Part 70 permit:

1. Because of change in record keeping frequency, Condition D.3.4(a), has changed from:

D.3.4 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each day;
 - (4) The cleanup solvent usage for each day;
 - (5) The total VOC usage for each day; and
 - (6) The weight of VOCs emitted for each compliance period.

to be as follows:

D.3.4 Record Keeping Requirements

- (a) To document compliance with Conditions D.3.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be ~~taken daily and shall be~~ complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.3.1.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - ~~(3) The volume weighted VOC content of the coatings used for each day;~~
 - (4) The cleanup solvent usage for each ~~day~~ **month**;
 - (5) The total VOC usage for each ~~day~~ **month**; and
 - (6) The weight of VOCs emitted for each compliance period.

Comment 28:

Since emissions from a baghouse are essentially zero (per AP-42), Fleetwood is proposing to reduce the compliance monitoring requirements of this condition. The conditions under D.4.5 should read as follows.

D.4.5(a)

At a minimum of once per week, the permittee shall conduct a six (6) minute visible emissions survey of the baghouse.

D.4.5(a)(1)

If any visible emissions, from the baghouse, are detected for more than 5% (18 seconds) of the survey time, a test shall be conducted on the baghouse pursuant to 326 IAC 5-1-4.

D.4.5(a)(2)

If visible surveys and/or observations conducted during 10 consecutive observation weeks show no visible emissions from the baghouse, the permittee may reduce the minimum frequency to once per calendar month. Anytime the monthly visible emissions survey show any visible emissions, or when requested by IDEM-OAM inspector, the observations for visible emissions shall start over with weekly surveys, as noted in condition D.4.5(a).

Response to Comment 28:

The OAM believes that a daily visual observation is not too burdensome a requirement in order to show continuous compliance. It is simply a "normal" or "abnormal" reading once per daylight operations. Therefore, this condition will remain unchanged.

Comment 29:

The condition D.4.8(a) should be changed to reflect the changes proposed in D.4.5(a). The condition should read as follows.

To document compliance with Condition D.4.5, the permittee shall maintain weekly and/or monthly observation records required in parts D.4.5(a) & (a)(2). Furthermore, if the requirements of D.4.5(a)(1) are met the permittee will keep records pursuant to 326 IAC 5-1-4.

Response to Comment 29:

As stated in the response to Comment 28, the compliance monitoring requirements for the baghouse will not be changed, therefore, the record keeping requirements will remain unchanged.

Comment 30:

It appears that there is a typo in the condition D.4.8(b) as currently written. We believe the condition should read as follows.

To document compliance with Condition D.4.6, the permittee shall maintain quarterly (3 months) records of the results of the inspections performed on the baghouse.

Response to Comment 30:

The OAM agrees and this typo will be corrected. Also, Condition D.4.5 should be added to D.4.8(a) to document compliance with visible emission notations.

The following changes will be made to the final Part 70 permit::

1. Because of a typo in the Record Keeping and Reporting Requirement, Condition D.4.8(b), has changed from:

D.4.8 Record Keeping Requirements

- (a) To document compliance with Condition D.4.4, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust.
- (b) To document compliance with Condition D.4.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5

to be as follows:

D.4.8 Record Keeping Requirements

- (a) To document compliance with Condition D.4.4 **and D.4.5**, the Permittee shall maintain records of daily visible emission notations of the baghouse exhaust.
- (b) To document compliance with Condition D.4.6, the Permittee shall maintain records of the results of the inspections required under ~~Condition D.2.5~~ **D.4.6**.

Upon further review, OAM has made the following changes to the final Part 70 permit (changes are bolded for emphasis):

1. Condition A.5 (Prior Permit Conditions Superseded) has been deleted. Language has been added to B.14 (Permit Shield) to address the effect of prior permit conditions. U.S. EPA stated that it would object to any permit that contained such supersession language.
2. Condition B.1(b) (Permit No Defense) has been revised to reference the permit shield condition that is found later in Section B.
 - (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, **as set out in this permit in the Section B condition entitled "Permit Shield."**
3. The last two lines of Condition B.8 (Duty to Supplement and Provide Information), have been deleted:

Such confidentiality claim shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM).
4. Condition B.8 (c) (Duty to Supplement Information) has been revised to clarify how the Permittee may assert a claim that records are confidential information:
 - (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records,** ~~For information claimed to be confidential,~~ the Permittee ~~must~~ **shall** furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, **to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records,** then the Permittee ~~must~~ **shall** furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

5. Section B.11 (c) (Annual Compliance Certification) has been revised to match changes to the federal Part 70 rules. The language in (c)(3) has been revised since it appears to be a clarification rather than a change in the requirement. The language in (c)(5) has been added to clarify the treatment of insignificant activities. OAM is revising the nonrule policy document Air-007 NPD to provide more guidance regarding the annual compliance certification requirements for sources with Title V permits:

(c) The annual compliance certification report shall include the following:

- (1) The identification of each term or condition of this permit that is the basis of the certification;
- (2) The compliance status;
- (3) Whether compliance was **based on** continuous or intermittent **data**;
- (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); ~~and~~
- (5) Any insignificant activity that has been added without a permit revision; and**
- ~~(5)~~ **(6)** Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The ~~notification which shall be submitted~~ **submittal** by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

6. Condition B.12 (a) (Preventive Maintenance Plan) has been revised to more closely match the language in 326 IAC 1-6-3. A provision allowing a one time extension of the time within which the Permittee must prepare and maintain the PMP has also been added to (a).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

-
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each **facility**:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

**Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
 - (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.
7. The statement following subsection (5)(C) of Condition B.13 (Emergency Provisions), has been changed.
- The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1~~(33)~~(34).
8. Condition B.14 (Permit Shield) condition has been revised to clarify how the permit shield affects applicable requirements from previous permits and how the permit shield affects determinations that a specific requirement is not applicable to the source.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.**
- ~~(a)~~ **(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.** Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided ~~that either of the following:~~
 - (1) The applicable requirements are included and specifically identified in this permit; ~~or~~
 - (2) ~~IDEM, OAM, in acting on the Part 70 permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 permit includes the determination or a concise summary thereof. The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.~~
- ~~(b)~~ **(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.**
- ~~(c)~~ **(d) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order. No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.**

~~(d)~~ **(e)** Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
- (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
- (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
- (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

~~(e)~~ **(f)** This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

~~(f)~~ **(g)** This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

~~(g)~~ **(h)** This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

9. Condition B.16 (Deviations from Permit Requirements and Conditions) has been revised to add the deviation terminology that had been contained in Section C, in the General Reporting Requirements condition:

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
- (2) An emergency as defined in 326 IAC 2-7-1(12); or**
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (b) (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- (e) (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.
10. Condition B.18 (a) (Permit Renewal) has been changed as follows to clarify the treatment of certain trivial activities :
- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) **and 326 IAC 2-7-1(40).**
11. Conditions B.19 (Administrative Permit Amendment), B.20 (Minor Permit Modification) , and B.21 (Significant Permit Modification) have all been combined into one condition numbered B.19 (Permit Amendment or Modification). Conditions B.20 and B.21 have been deleted. The new Condition B.19 (Permit Amendment or Modification) will read as follows:

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) **The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.**
- (b) **Any application requesting an amendment or modification of this permit shall be submitted to:**
- Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**
- Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.**
- (c) **The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]**
12. Condition B.26 (now renumbered B.24) (Inspection and Entry) has been revised to remove the requirement for an IDEM identification card, which other agencies do not have.

B.264 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of ~~IDEM~~ **proper** identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
 - (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
 - (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]
- (1) **The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]**
 - (2) **The Permittee, and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]**
13. Condition B.27 (b)(now re-numbered B.25) (Transfer of Ownership or Operation) has been revised to clarify that this notification does not require a certification by a responsible official.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. **The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
14. Condition B.28 (now renumbered B.26) (Annual Fee Payment) has been revised to clarify the Permittee's responsibility for the timely payment of annual fees.
- B.286 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**
-
- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. ~~or in a time period consistent with the fee schedule established in 326 IAC 2-7-19.~~ **If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.**
 - (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
 - (c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date, The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. The applicable fee is due April 1 of each year.~~

15. Condition B.27 (Credible Evidence) is a new condition. U.S. EPA stated that it would object to any permit that did not address the use of credible evidence. It reads as follows:

B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.

16. Condition C.1 "PSD Minor Source Status" has been deleted from the final permit as follows. The remaining conditions of this section have been renumbered.

~~C.1 PSD Minor Source Status [326 IAC 2-2][40 CFR 52.21]~~

~~(a) The total source potential to emit particulate matter is limited to 249 tons per 365 consecutive day period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.~~

~~(b) Any change or modification which may increase potential emissions to 250 tons per twelve (12) consecutive month period, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.~~

17. Condition C.2 (Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour) is a new condition that reads as follows to address the PM emission limitation for facilities below 100 pounds per hour.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

18. Condition C.7 (now renumbered C.8) (Operation of Equipment) has been revised to clarify the requirement.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation. as described in Section D of this permit.

19. Conditions C.7 (Asbestos Abatement Projects-Accreditation) and C.16 (Asbestos Abatement Projects) have been combined into one new condition C.10 (Asbestos Abatement Projects).

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or**

- (2) If there is a change in the following:
- (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.
20. Condition C.8 (Performance Testing) is revised to correct a rule citation, add a notification requirement, and clarify that any submittal under this condition does not require a certification by a responsible official:

C.8 Performance Testing ~~[326 IAC 3-2-1]~~ **[326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2-1~~ **3-6** (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days ~~before~~ **prior to** the intended test date. **The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.**

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

21. Condition C.9 (Compliance Schedule) has been revised to more closely match the rule language.

C.9 Compliance Schedule [326 IAC 2-7-6(3)]
The Permittee:

- (a) **Has certified that all facilities at this source are in compliance with all applicable requirements; and** ~~Will continue to comply with such requirements that become effective during the term of this permit; and~~
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) **Will comply with such applicable requirements that become effective during the term of this permit.** ~~Has certified that all facilities at this source are in compliance with all applicable requirements.~~

22. Condition C.10 (Compliance Monitoring) has been revised to allow a one time extension of the time to install and initiate any required monitoring.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee **may extend compliance schedule an additional ninety (90) days provided the Permittee** ~~shall~~ notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, **prior to the end of the initial ninety (90) day compliance schedule** ~~no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date. and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

23. Condition C.12 (Monitoring Methods) has been revised to clarify the requirement.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

24. Condition C.14 (Compliance Monitoring Plan-Failure to Take Response Steps) the following rule cites were changed and added to the title, as follows:

**C.19 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5(3)]
[326 IAC 2-7-6] [326 IAC 1-6]**

27. Condition C.15 is revised to add the following rule cites to the title, and clarify that any submittal under this condition does not require a certification by a responsible official.

**C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

28. Condition C.21 (a) has been revised to clarify the certification requirement for the emission statement.

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

- (a) The Permittee shall submit ~~an certified~~, annual emission statement **certified pursuant to the requirements of 326 IAC 2-6**, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

29. Condition C.18 (General Record Keeping) is revised to add the following rule citation and to change the requirements for keeping records, making records available, and furnishing records, to more closely match the rule language as follows:

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)(B)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement,

report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request of an IDEM, OAM, representative, for a minimum of three (3) years. They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~

30. Condition C.24 (General Reporting Requirements) is revised to clarify what is included in the compliance monitoring reports and clarify that any submittal under this condition does not require a certification by a responsible official. The deviation terminology was moved to a Section B condition titled Deviations from Permit Requirements and Conditions.

C.24 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the **compliance monitoring** requirements stated in this permit the source shall submit a Quarterly Compliance **Monitoring** Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~

- ~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
- ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~
- ~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation;~~
- ~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter;~~
- ~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the~~

~~required compliance monitoring is a deviation:~~

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

31. The facility description box in Section D is revised to include the rule citation:

Facility Description [326 IAC 2-7-5(15)]

32. D.1.4, D.2.5, D.3.2, D.4.3 (Testing Requirements) has been changed as follows.

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

~~Testing of The Permittee is not required to test this facility is not specifically required by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.~~ If testing is required by IDEM, compliance with the VOC or PM limit specified in Condition D.1.1, D.2.1 or D.3.1 respectively shall be determined by a performance test conducted in accordance with Section C - Performance Testing. ~~This does not preclude testing requirements on this facility under 326 IAC 2-7-5 and 326 IAC 2-7-6.~~

33. D.1.5 and D.3.3 (Volatile Organic Compounds) change the following rule cites. The purpose of this change is to make the condition less specific.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.3.1 shall be determined pursuant to ~~326 IAC 8-1-4(a)(3)(A)~~ **326 IAC 8-1-4(a)(3)** and ~~326 IAC 8-1-2(a)(7)~~ **326 IAC 8-1-2(a)** using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

34. D.3.4 (VOC Emissions) is a new condition. The remainder of Section D has been renumbered accordingly.

D.1.8 VOC Emissions

Compliance with Condition D.3.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

35. D.4.7 has been changed as follows:

D.4.7 Broken Bag or Failure Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. **For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.**

- 36 The Certification Form is revised to clarify which forms require a certification.
- 37. The Emergency/Deviation Occurrence Reporting Form is revised to eliminate the certification requirement.
- 38. The Quarterly Compliance Report is renamed the Quarterly Compliance Monitoring Report and is revised to make it easier to understand and use.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Fleetwood Travel Trailers of IN, Inc.
Source Address: 1635 Elmore Street, Crawfordsville, IN 47933
Mailing Address: P.O. Box 665, Crawfordsville, IN 47933
Part 70 Permit No.: T107-7928-00045
Facility: Molding and Final Finish Station, EU-3
Parameter: VOC
Limit: 24 tons per 12 month rolling period

YEAR: _____

	VOC Emissions	Previous 11 Months	Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Fleetwood Travel Trailers of IN, Inc.
Source Address: 1635 Elmore Street, Crawfordsville, IN 47933
Mailing Address: P.O. Box 665, Crawfordsville, IN 47933
Part 70 Permit No.: T107-7928-00045

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

~~9 Emergency/Deviation Occurrence Reporting Form~~

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Fleetwood Travel Trailers of IN, Inc.
Source Address: 1635 Elmore Street, Crawfordsville, IN 47933
Mailing Address: P.O. Box 665, Crawfordsville, IN 47933
Part 70 Permit No.: T107-7928-00045

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C	The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Fleetwood Travel Trailers of IN, Inc.
Source Address: 1635 Elmore Street, Crawfordsville, IN 47933
Mailing Address: P.O. Box 665, Crawfordsville, IN 47933
Part 70 Permit No.: T107-7928-00045

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the **compliance monitoring** requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the **compliance monitoring** requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify ~~zero in the column marked "No Deviations"~~ in the box marked **"No deviations occurred this reporting period"**.

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD: LIST EACH COMPLIANCE REQUIREMENT EXISTING FOR THIS SOURCE:

<u>Compliance Monitoring Requirement</u> (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

- (2) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (3) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (4) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (5) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (6) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (7) Paved and unpaved roads and parking lots with public access.
- (8) Filter or coalescer media changeout.
- (9) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

Existing Approvals

The source has been operating under the following approvals:

- (1) CP 107-3252-00045, issued on June 13, 1994.

Enforcement Issue

There are no Enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 19, 1996. A notice of completeness letter was mailed to Fleetwood Travel Trailers of IN, Inc. on January 23, 1997.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	greater than 250
PM-10	greater than 250
SO ₂	less than 100
VOC	less than 100
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Toluene	greater than 10
Xylene	less than 10
Glycol Ethers	greater than 10
Ethylbenzene	less than 10
Hexane	less than 10
Methyl Ethyl Ketone	less than 10
Methyl Isobutyl Ketone	less than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in the Indiana Rule) of PM-10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in Indiana Rule) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in Indiana Rule) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1995 data submitted in the Fleetwood Travel Trailers of IN, Inc. Title V application.

Pollutant	Actual Emissions (tons/year)
PM	0
PM-10	0
SO ₂	0
VOC	9
CO	0
HAP Ethylene Glycol	0.003
Vinyl Acetate	0.0008

Glycol Ether	0.34
Methyl Isobutyl Ketone	1.381
Ethyl Benzene	0.74
Toluene	8.18
Hexane	0.645
Xylene	2.106
Methyl Ethyl Ketone	1.18
NO _x	0

County Attainment Status

The source is located in Montgomery County.

Pollutant	Status
TSP	attainment
PM-10	unclassifiable
SO ₂	attainment
NO ₂	unclassifiable/attainment
Ozone	unclassifiable/attainment
CO	unclassifiable/attainment
Lead	not designated

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Adams County has been designated as attainment or unclassifiable for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) Fleetwood Travel Trailers of IN, Inc. is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.390, Subpart MM), because trailers are not considered automobiles.

- (b) Fleetwood Travel Trailers of IN, Inc. is not subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 20-14, (40 CFR 63.800, Subpart JJ) because the cabinet shop booth does not have the potential to emit 10 tons per year or more of a single hazardous air pollutant or 25 tons per year or more of any combination of hazardous air pollutants.
- (c) Fleetwood Travel Trailers of IN, Inc. Is not subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.460 Subpart T because they do not use in the degreaser any solvent containing the following as a cleaning or drying agent:
 - (1) perchloroethylene
 - (2) trichloroethylene
 - (3) 1,1,1-trichloroethane
 - (4) carbon tetrachloride
 - (5) chloroform

State Rule Applicability - Entire Source

326 IAC 2-2 Prevention of Significant Deterioration

This source is not a major stationary source because emissions of criteria pollutants are less than 250 tons per year. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-7-5(3)(C)(iii), the Permittee shall submit a certified, annual emission statement that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:

- (1) Contain actual emissions of criteria pollutants from the source;
- (2) Contain actual emissions of other regulated pollutants from the source.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3-2 (Process Operations)

- (a) Pursuant to CP 107-3252-00045, issued on June 13, 1994, the particulate matter (PM) overspray from the spray booths shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The overspray from the paint booths shall be considered in compliance provided that the overspray is not:

- (1) visibly detectable at the exhaust;
 - (2) detectable on the rooftops; or
 - (3) causing any nuisance problems.
- (b) The baghouse shall be operated at all times and the particulate matter (PM) emissions from the woodworking operation, EU-4, shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

$$E = 4.10 (0.86)^{0.67}; E = 3.7 \text{ lbs/hr}$$

Based on the information submitted and the calculations made (Appendix A, page 1 of 2), the woodworking operation is in compliance with this rule.

326 IAC 8-1-6 (BACT)

The potential VOC emissions from the caulks and adhesives used in EU-3, Molding and Final Finish Station, are less than 25 tons/yr. Therefore, 326 IAC 8-1-6 does not apply.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the chassis fabrication paint booth shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the paint booth is in compliance with this requirement. (See page 1 of 3, Appendix A).

326 IAC 8-2-12 (Surface Coating emission limitations: wood furniture and cabinet coating)

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coatings applied to wood furniture and wood components at the cabinet shop booth, EU-2, shall utilize one or more of the following application methods:

Airless Spray Application
Air-Assisted Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application

Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip-and-Drain Application

High volume low pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system. High volume low pressure spray is an acceptable alternative application of air-assisted airless spray.

Based on information submitted, Fleetwood Trailer of IN, Inc. uses airless spray application for wood coating and, therefore, is in compliance with this requirement.

326 IAC 8-3-5 (Cold cleaner degreaser operation and control)

- (a) Pursuant to 326 IAC 8-3-5, the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can easily be operated with one (1) hand if:
 - (A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) the solvent is agitated; or
 - (C) the solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):

- (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) The owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The spray booths have applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation.
 - (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground.

The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary to show compliance with 326 IAC 6-3-2.

- 2. The chassis fabrication painting operation has applicable monitoring conditions as specified below:

- (a) Record keeping of information sufficient to show that VOC emissions are not discharged in excess of 3.5 lb/gal of coating, excluding water.

These monitoring conditions are necessary to show compliance with 326 IAC 8-2-9.

- 3. The woodworking operation has applicable monitoring conditions as specified below:

- (a) An inspection shall be performed each calendar quarter of all bags controlling woodworking operations. All defective bags shall be replaced. A record shall be kept of the results of the inspection and the number of bags replaced.

- (b) Visible emission notations of the exhaust from the baghouse shall be performed as follows:

- (1) Daily visible emission notations of the baghouse exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (2) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (3) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (4) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (5) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

- (c) Broken bag or failure detection: In the event that bag failure has been observed:

- (1) The affected compartments will be shut down immediately until the units have been replaced.

- (2) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

These monitoring conditions are necessary because the baghouse must operate properly to ensure compliance with 326 IAC 6-3-2 and 326 IAC 5-1-2.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the Clean Air Act.
- (b) See attached calculations, page 2 of 2 Appendix A, for detailed air toxic calculations.
- (c) Since this source has no new construction or reconstruction, 326 IAC 2-1-3.4 New Source Toxics Control, does not apply.

Conclusion

The operation of this travel trailer manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T107-7928-00045**.

Description of facility: EU-1, EU-2
Max Rating: 4 units/hr
Construction Date: 1985, 1980
Control Device (if any): Dry Filters
Stack/Vent ID: S1, S2

Facility class: **Description:**

EMISSION LIMITATIONS		EU-2	EU-1
Numerical Emission Limit:	Particulate Matter Emissions	HAPS Emissions	3.5 lbs VOC per gallon of coating, less water
Regulation/Citation:	326 IAC 6-3-2	326 IAC 20-14, 40 CFR 63.800	326 IAC 8-2-9
Compliance Demonstration:	Record Keeping	Recordkeeping	Record Keeping
PERFORMANCE TESTING			
Parameter/Pollutant to be Tested:	NA	NA	NA
Testing Method/Analysis:	NA	NA	NA
Testing Frequency/Schedule:	NA	NA	NA
Submittal of Test Results:	NA	NA	NA
COMPLIANCE MONITORING			
Monitoring Description:	NA	NA	NA
Monitoring Method:	NA	NA	NA
Monitoring Regulation/Citation:	NA	NA	NA
Monitoring Frequency:	NA	NA	NA
RECORD KEEPING			
Parameter/Pollutant to be Recorded:	Dry filters in place whenever spray booth is in use; Overspray not visibly detectable at the exhaust, on the rooftop or on the ground; and does not cause a nuisance problem.	Finishing material and adhesives, HAPS content	coating and solvent usage, VOC content, dates of use
Recording Frequency:	Filters-Daily, Visual Observations-Weekly	monthly	monthly
REPORTING REQUIREMENTS			
Information in Report:	filters in use, visual observations	usage	VOC emissions
Reporting Frequency/Submittal:	upon request	upon request	upon request

Description of facility: Woodworking, EU-4
Max Rating: 1727 lbs/hr
Construction Date: 1993
Control Device (if any): Baghouse
Stack/Vent ID: S4

Facility class: **Description:**

EMISSION LIMITATIONS		
Numerical Emission Limit:	3.72 lb/hr particulate emissions	40% Opacity
Regulation/Citation:	326 IAC 6-3-2	326 IAC 5-1-2
Compliance Demonstration:	Record Keeping	Record keeping
PERFORMANCE TESTING		
Parameter/Pollutant to be Tested:	NA	NA
Testing Method/Analysis:	NA	NA
Testing Frequency/Schedule:	NA	NA
Submittal of Test Results:	NA	NA
COMPLIANCE MONITORING		
Monitoring Description:	NA	NA
Monitoring Method:	NA	NA
Monitoring Regulation/Citation:	NA	NA
Monitoring Frequency:	NA	NA
RECORD KEEPING		
Parameter/Pollutant to be Recorded:	Baghouse inspection, Broken Bag Detection Procedures	Visual observations
Recording Frequency:	quarterly	daily- once per working shift
REPORTING REQUIREMENTS		
Information in Report:	Inspection results	Normal/Abnormal results
Reporting Frequency/Submittal:	Upon request	Upon request
Additional Comments:		

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

**Company Name: Fleetwood Travel Trailers of IN, Inc.
Address City IN Zip: 1635 Elmore Street, Crawfordsville, IN 47933
County: Montgomery
Part 70 No. T107-7928-00045
Reviewer: J. Patterson
Date: 9/8/97**

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Tectyl 329 HG Black	9.45	60.00%	47.0%	13.0%	41.0%	32.00%	0.455	4.000	2.08	1.23	2.24	53.66	9.79	10.55	3.84	65%
Glycol Ether EB Solvent *	7.51	100.00%	0.0%	100.0%	0.0%	0.00%	0.032	4.000	7.51	7.51	0.96	23.07	4.21	0.00	ERR	65%
Hoosier 1887 **	6.92	100.00%	49.0%	51.0%	41.0%	0.00%	0.064	4.000	5.98	3.53	0.90	21.68	3.96	0.00	ERR	65%

* This solvent is hand applied to clean any miscellaneous oils from the steel prior to painting.

** Clean-up solvent

State Potential Emissions	Add worst case coating to all solvents	4.10	98.42	17.96	10.55
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METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

**Appendix A: Emission Calculations
For woodworking operations**

Page 2 of 3 TSD App A

Company Name: Fleetwood Travel Trailers
Address City IN Zip: 1635 Elmore Street, Crawfordsville, IN 47933
Part 70 No. T107-7928-00045
Reviewer: RJP
Date: 9/8/97

Process	Throughput (P) (lbs/hr)	Emission Point ID	Max. PM Conc. in Outlet from Dust Collector (C) grain/ascf	Average air flow rate (F) acfm	State Potential PM Emission				Control Eff.	Emission Before Control	Allowable PM Emissions		
					Fugitive (FE) lbs/hr	Discharge (DE) lbs/hr	lbs/day	tons/yr			(E) lbs/hr	lbs/day	tons/yr
Woodworking	1727	S4	0.002	4000.0	0.00	0.07	1.65	0.30	0.999	300.35	3.72	89.18	16.28

Total 0.000 0.069 1.646 0.300 0.999 300.349 3.716 89.185 16.276

METHODOLOGY

Discharge PM emission (lbs/hr) = PM conc. (grain/cft) * flow rate (acfm)*60(min/hr)1.4286e-4(lbs/grain)

Potential PM emission (lbs/day)=(DE+FE) *24 hr/day

Allowable PM Emission (E, lbs/hr)= 4.10*P^0.67, from 326 IAC 6-3

HAP Emission Calculations

Company Name: Fleetwood Travel Trailers of IN, Inc.
Plant Location: 1635 Elmore Steet, Crawfordsviller, IN 47933
County: Montgomery
Permit Reviewer: RJP
Date: 8/14/97

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Wt % Xylene	Wt % Toluene	Wt % Methyl Ethyl Ketone	Wt % Glycol Ethers	Wt % Methyl Isobutyl Ketone	Wt % Hexane	Wt % Methanol	Wt % Ethyl benzene	Wt % Ethylene Glycol	Xylene Emissions (ton/yr)	Toluene Emissions (ton/yr)	MEK Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)	MIK Emissions (ton/yr)	Hexane Emissions (ton/yr)	Methanol Emissions (tons/yr)	Ethyl benzene Emissions (tons/yr)	Ethylene Glycol Emissions (tons/yr)
Grn Contact Adh.	9.16	0.007	4.00	0.00%	3.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.03	0.00	0.00	0.00	0.00	0.09	0.00	0.00
Pemco1013	7.24	0.185	4.00	0.00%	46.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	10.79	0.00	0.00	0.00	0.00	0.00	0.00	0.00
#102 Glue	8.33	0.006	4.00	0.00%	0.00%	0.00%	0.00%	4.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.04	0.00	0.00	0.00	0.00
Const Adh 40	7.32	0.029	4.00	0.00%	20.00%	0.00%	0.00%	0.00%	3.00%	0.00%	0.00%	0.00%	0.00	0.74	0.00	0.00	0.00	0.11	0.00	0.00	0.00
Acrylic Clk White	10	0.002	4.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Rectorseal	11.41	0.002	4.00	0.00%	0.00%	0.00%	23.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.09	0.00	0.00	0.00	0.00	0.00
45675 Adhesive	9.6	0.036	4.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Oatey Cleaner	7.34	0.001	4.00	0.00%	0.00%	90.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.12	0.00	0.00	0.00	0.00	0.00	0.00
Parlast Wht Caulk	10.00	0.035	4.00	0.00%	35.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	2.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Scotch Grip	6.83	0.003	4.00	0.00%	5.00%	0.00%	0.00%	0.00%	15.00%	0.00%	0.00%	0.00%	0.00	0.02	0.00	0.00	0.00	0.05	0.00	0.00	0.00
Mineral Spirits	6.57	0.032	4.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Butyl Clk Wht	10.00	0.046	4.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Oatey Reg ABS	8.00	0.013	4.00	0.00%	0.00%	70.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	1.28	0.00	0.00	0.00	0.00	0.00	0.00
Stag Poly	10.41	0.003	4.00	3.30%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.02	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Seal Clr 2300	7.91	0.017	4.00	7.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.16	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Colormetric WBst	10.41	0.010	4.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Prepare Cleaner	11.00	0.004	4.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Butyl Caulk	7.75	0.058	4.00	0.00%	39.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	4.00%	0.00	3.07	0.00	0.00	0.00	0.00	0.00	0.00	0.32
Alumilsatic C	13.4	0.035	4.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
676 High Perf	5.66	0.000	4.00	0.00%	0.00%	0.00%	0.00%	0.00%	40.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Eth Gly MoBuEth	7.53	0.032	4.00	0.00%	0.00%	0.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	4.22	0.00	0.00	0.00	0.00	0.00
Hoosier 1887	6.92	0.064	4.00	41.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	10.00%	0.00%	3.18	0.00	0.00	0.00	0.00	0.00	0.00	0.78	0.00
Tectyl 329	9.45	0.455	4.00	0.00%	0.00%	0.00%	15.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	11.30	0.00	0.00	0.00	0.00	0.00
T-440 Glue	7.5	0.040	4.00	0.00%	15.00%	0.00%	0.00%	0.00%	30.00%	0.00%	0.00%	0.00%	0.00	0.79	0.00	0.00	0.00	1.58	0.00	0.00	0.00

Total State Potential Emissions

3.36 17.60 1.39 15.61 0.04 1.74 0.09 0.78 0.32

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs